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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0628

Comment submitted by Megan Gallagher, Interim Executive Director, Shenandoah Valley Network (SVN)

Submitter Information

Submitter's Representative: Megan Gallagher

Organization: Shenandoah Valley Network (SVN)

General Comment

Shenandoah Valley Network (SVN), a coalition of citizens groups working on land use and land protection issues in six counties in northwestern Virginia, has signed on to the extensive comments filed by the Choose Clean Water Coalition in support of TMDL standards and planning.

We would like to make two additional points unique to our region: the need to consider the impacts of natural gas mining using hydraulic fracturing of Marcellus shale deposits and the management of public forest lands in the Shenandoah Valley in rulemaking for TMDL standards.

While the TMDL regulations focus on nitrogen and phosphorous levels from farm and wastewater treatment facilities, they do not address the impacts of gas mining wastewater or the significant sediment issues from the extensive land disturbance created around these gas well sites. EPA has a separate study underway on the impacts of Marcellus shale gas mining on drinking water resources. Our colleagues have been told this is "not related" to TMDL rulemaking. However, we believe intensive gas mining development in the Shenandoah Valley could lead to much greater degradation of water quality in the Chesapeake Bay tributaries in our region. Please see the attached map.

We were also told that there has been little coordination between TMDL rulemaking and U.S. Forest Service planning for the George Washington National Forest, as a new forest management plan nears completion. SVN strongly supports careful management of drinking water resources in the forest. Land disturbance for timber harvesting, road building and/or Marcellus shale gas mining are likely to have significant impacts on local drinking water quality and the Chesapeake Bay.

We appreciate your consideration of these issues in TMDL rulemaking.

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Attachments

EPA-R03-OW-2010-0736-0628.1: Comment attachment submitted by Megan Gallagher, Interim Executive Director, Shenandoah Valley Network (SVN)